



EPA Region 5 Records Ctr.



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**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, ILLINOIS 60604

(312)886-7251

clarke.rosita@epa.gov

DATE: **March 24, 2003**

TO: Russell Hart, RPM  
Remedial Response Branch, SR-6J

FROM: Rosita Clarke-Moreno  
Regional Five-Year Review Coordinator

SUBJECT: South East Rockford Groundwater Contamination Superfund Site  
Five-Year Review Comments

I have reviewed the draft Five-Year Review prepared for the South East Rockford Groundwater Contamination Superfund Site. I realize that the Site Inspection is still to take place so I took that into consideration and provide comments in general to the format or text of that information provided thus far. Following are my comments and observations.

- Please confirm that Illinois EPA is used throughout the document instead of **ILEPA**, I believe, unless things have changed, that Illinois EPA requested that we use **Illinois** in their name....Both of these are in the report and it should be consistent.
- Executive Summary - The last paragraph on page ES3 summarizes the protectiveness Statement. This statement should be consistent with Section X and with that in the Summary Form. Please review the protectiveness statement and revise/modify as appropriate. In my opinion, I believe that it can be stated that remedy is protective for OU1 and OU2 and that OU3 will be protective when remedy is complete. My recommendation is to make the statement as accurate and clear as possible.
- Summary Form- Is there PCOR at the Site? I am trying to verify Review Type still...so I will discuss this with you separately, later. Under Recommendations and Follow-up Actions, you can place them in bullet form and summarize from Section IX. This Summary Form is where items should be summarized from Report and easily taken for CERCLIS entry in the future. The Issues should also reflect Section XIII. Likewise, the Recommendations should reflect the issues of concern and those that affect the remedy's protectiveness if left with no further action. I think you pretty much did this, I just recommend looking at each Issue closely and ensuring 1) that this issue affects protectiveness if nothing is done about it and if so, the recommendation for each issue should reflect that as well. These Issues will also be tracked in CERCLIS so we also need a

Responsible Party for Implementing the Issue and a Due Date....

- Site Chronology - Insert date of Initial RI/FS for OU1...Was this under a Removal Action? This should be clearly stated with Action Memo Date? I know the History may seem complicated for a new reader so if you can clarify as best as possible that would help. Can you also provide expected date of RA activities?
- Pages 4, 5 and through out Report - Because of the extensive History, I recommend that you BOLD and/or Increase the font for the Subsections such as for **Land and Resource Use, History of Contamination**, etc....
- Page 5, Second paragraph- Residents' should probably be **residential**.
- Page 9, OU3- Please add brief status information of these activities, since you are in Design stage a statement that these are the remedy (ies) selected for these source areas, and that these are expected to be implemented in the future. I think you begin to mention this in the Remedy Implementation Section but I think this would help. I had to go through these sections a few times before I understood the whole picture....(it is probably only me.....but just in case....).
- Page 16 - In being consistent with the Guidance, is the section Interpretation/Discussion of Overall Groundwater Remedial Action to Date, equal or similar to the **System Operation/O&M**, of the Guidance? Or possibly a title such as O&M data and Overall Groundwater Remedial action to date? Something to think about....
- Section VI. Five Year Review Process - should have the following Subsections:
  - Administrative Components
  - Community Notification and Involvement /
  - Document Review
  - Data Review
  - Site Inspection
  - Interviews

These subsection only have to reflect what was done for these items, and not specifically summarize everything again. For example in Document and Data Review, you can briefly state that all records pertaining to the site were reviewed and that date was summarized in other sections and reference reader to the other sections.
- Section VII. Technical Assessment - For questions A and B, I suggest starting the response with **Yes**, and then the explanation as given. For Question C - I recommend starting out the response with a summary sentence, maybe stating that the vapor intrusion into indoor air could potentially cause a concern for protectiveness of the remedy....for example, the first paragraph could be rewritten as..  
*"Yes, as has been discussed in the remedial actions taken for OU#2, in 1993-1994 some 20 residences around Areas 4 and 7 had indoor air samples collected and analyzed, and that no excessive risk was demonstrated at that time...."*
- Section VIII. Issues - It may be easier to number the issues. Is (6) an issue that you feel needs to be addressed now? If so, the issues need to be listed as affecting future protectiveness.
- IX. Recommendations and Follow-up Actions - Following the new guidance, please add the table and information as in **Exhibit 4-4 of the Guidance, page 4-13. Follow-up Actions** need to be identified with a Responsible Party to implement these actions and a time frame of completion.

- Section X. Protectiveness Statement. I recommend that the first sentence be deleted and exchanged for: ***The remedy implemented at OU1 and OU2 is protective of Human Health and the Environment, all immediate health threats have been addressed and no exposures of concern.***

The second paragraph should state that the remedy at OU3 ***is expected to be protective upon completion.***

- XI. Next Review - ***The next Five Year Review will be completed within 5 years of signature of this report, ( May? 2008)***

If you have any questions, please contact me.